

REMARKS

This Amendment is responsive to the Office Action dated April 18, 2007. All rejections and objections of the Examiner are respectfully traversed. Reconsideration and further examination are respectfully requested.

Applicants wish to thank the Examiner and his Supervisor for their helpful comments in a telephone interview held June 19, 2007. The interview provided an opportunity for the undersigned Attorney to explain the amended claims to the Examiner, and the present amendment is submitted to enable the Examiner to further consider these amended claims.

The amendments to the claims herein are supported at various places in the Specification as originally filed. For example, the tag 100 of Fig. 3 is shown including an "onclick" attribute 102, an "onkeydown" attribute 104, and a "tabindex" attribute 106. See the Specification at line 8 of page 11 through line 20 on page 12. See also lines 1-7 on page 14. The keyboard event event handler of the amended claims is supported by the function 200 shown in Fig. 4, and described by the text beginning at line 8 on page 14 through line 9 on page 15.

At paragraphs 2-5 of the Office Action, the Examiner rejected claims 25-27 for non-statutory subject matter under 35 U.S.C. 101. Claims 25-27 have been cancelled herein.

At paragraphs 6-18, the Examiner rejected claims 1-27 for obviousness under 35 U.S.C. 103, citing the combination of "Using JavaScript to Create a Powerful GUI" of Hourihan ("Hourihan"), W3C 4.01 Specification ("W3C"), and "Creating a Modal Dialog Box" of Shiran ("Shiran"). Applicants respectfully traverse this rejection.

Hourihan discloses an HTML code segment that creates a button using an tag. The button of the Hourihan article is mouse-operable only, and Hourihan includes no hint or suggestion of even the desirability of providing keypress operability of the button in the

Hourihan HTML example. W3C discloses that the tabindex attribute was available for form HTML elements, listed on page 19 as the A, AREA, BUTTON, INPUT, OBJECT, SELECT, and TEXTAREA elements. W3C further discloses that the "enter" key may be used to activate a selected one of those listed HTML elements. Shiran discloses that Internet Explorer allows the creation of modal dialog boxes.

Nowhere in the combination of Hourihan, W3C and Shiran is there disclosed or suggested any system or method for creating at least one accessible graphical image within a modal dialog box graphical object, comprising:

- providing said modal dialog box graphical object; and
- providing said at least one accessible graphical image within said modal dialog box graphical object, wherein said providing said at least one accessible graphical image is responsive to at least one image command, said image command including
 - a first attribute determining the processing of at least one predetermined keyboard event, *wherein said first attribute is an event handler attribute that invokes a keyboard event event handler, wherein said keyboard event handler operates to compare a keyboard event object value indicating which key was pressed with a predetermined value indicating that the return key was pressed, and, in the event that said event object value matches said predetermined value, invoking a software routine operable to perform a predetermined function associated with said accessible graphical image and preventing an actual carriage return from being performed,*
 - a second attribute determining the processing of mouse click events, wherein said second attribute is an event handler attribute that invokes said software routine operable to perform said predetermined function associated with said accessible graphical image, *wherein said first attribute and said second attribute both pass the same parameter to said software routine operable to perform said predetermined function associated with said accessible graphical image, such that said software routine operable to perform said predetermined function associated with said accessible graphical image operates the same in response to a user pressing said enter key and in response to said user performing a mouse click,* and
 - a third attribute having a parameter indicating an ordinal value to be associated with said at least one graphical image, *wherein said ordinal value represents a relative position within an ordering of graphical images within said modal dialog box graphical object, whereby a user is allowed to access said at least one graphical image by using a keyboard action resulting in ones of said graphical images within said modal dialog box being sequentially accessed responsive to said ordering of graphical images within said modal dialog box.* (emphasis added)

as in the present independent claims. In contrast, the enter key in the combined references is only described as resulting in element activation for the elements listed in section 17.11.1 of W3C (A, AREA, BUTTON, INPUT, OBJECT, SELECT, and TEXTAREA), which expressly do not include the tag. Moreover, even adding the tabindex of the elements listed in 17.11.1 of W3C to an the element of Hourihan, within the modal dialog box of Shiran, in order to allow the element to obtain focus in response to the tab key, *would not allow activation of the element via the enter key*. Element activation in response to mouse click, enter key, or space bar is provided in the prior art for the elements listed in 17.11.1 of W3C by combination of the onclick handler and underlying logic in the Web browser that interprets the HTML. Accordingly, the combined references do not include any hint or suggestion of handling keyboard events using a keyboard event event handler in an tag that is tab indexed, far less any teaching regarding processing a keyboard event using a keyboard event event handler in an element that checks the pressed key to determine whether the "enter" key was pressed, and that operates in the case where the pressed key was the "enter" key to call the same function with the same parameter as is called directly for a mouse click event as defined in the same element, and that also prevents an actual carriage return from being performed if the "enter" key was pressed. Such processing is not disclosed or suggested in either the form elements of 17.11.1 in W3C, the buttons of Hourihan, or the modal dialog box creation of Shiran.

Applicants respectfully disagrees with the Examiner's assertion in the second paragraph on page 4 of the Office Action that "W3C discloses an attribute that handles keyboard event". The event attribute in <BUTTON> element of the HTML example beginning on the bottom of page 19 in W3C is onclick="get-database". This is consistent with the fact that Web browser

interpreting of that HTML example would include handling mouse click, enter key, and space bar user actions on the button by invoking "get-database" in response to the onclick="get-database" attribute. There is therefore no need for the <BUTTON> element (or any of the other elements listed in 17.11.1) to include a keyboard event event handler, as is provided in the element of the present independent claims.

For the above reasons, Applicants respectfully urge that the combination of Hourihan, W3C and Shiran does not disclose or suggest all the features of the present independent claims. The combination of Hourihan, W3C and Shiran therefore does not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to the present independent claims. As to the dependent claims, they are respectfully believed to be patentable over the combination of Hourihan, W3C and Shiran for at least the same reasons.

Reconsideration of all pending claims is respectfully requested.

Applicants have amended the independent claims, and cancelled various dependent claims from further consideration in this application. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Examiner, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of allowable subject matter. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Applicants' Attorney at the number listed below so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

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Date

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